

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re:

03-MDL-1570 (GBD)(SN)

**TERRORIST ATTACKS ON
SEPTEMBER 11, 2001**

**IRAN NOTICE OF
AMENDMENT**

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This document relates to:

Susan M. King, et al. v. Islamic Republic of Iran, No. 1:22-cv-05193-UA

Plaintiffs file this Notice of Amendment with respect to the underlying Complaint in the above-referenced matter, ECF No. 1, as permitted and approved by the Court's Order of October 28, 2019, MDL ECF No. 5234. Upon the filing of this Notice of Amendment, the underlying Complaint is deemed amended to add the individual(s) listed below (the "New Plaintiff(s)") as plaintiff(s) raising claims against the Islamic Republic of Iran. The underlying Complaint is deemed amended to include the allegations, as indicated below, of (a) the Federal Insurance and Ashton Plaintiffs' Amended Consolidated Complaint Against Defendant, the Islamic Republic of Iran, MDL ECF No. 3237, or (b) the Amended Complaint, Burnett v. Islamic Republic of Iran, No. 15-CV-9903 (GBD)(SN) (S.D.N.Y. Feb. 8, 2016), ECF No. 53. The amendment effected through this Notice of Amendment supplements by incorporation into, but does not displace, the underlying Complaint. This Notice of Amendment relates solely to the Islamic Republic of Iran and does not apply to any other defendant.

Upon filing this Iran Notice of Amendment, each New Plaintiff is deemed to have adopted all factual and jurisdictional allegations of the complaint that has been joined as

specified below; all causes of action contained within that complaint; all prior filings in connection with that complaint; and all prior Orders and rulings of the Court in connection with that complaint.

Additionally, each New Plaintiff incorporates the factual allegations and findings contained in those pleadings and orders filed at Havlish v. Bin Laden, No. 1:03-CV-9848 (GBD)(SN) (S.D.N.Y.), ECF Nos. 263, 294, 295; In re Terrorist Attacks on September 11, 2001, 03-MDL-1570 (GBD)(SN) (S.D.N.Y.), MDL ECF Nos. 2430, 2431, 2432, 2433, 2473, 2515, 2516; and evidence submitted at the proceedings before the Honorable George B. Daniels on December 15, 2011 (MDL ECF No. 2540).

CAUSES OF ACTION

Each New Plaintiff hereby adopts and incorporates herein by reference all factual allegations, jurisdictional allegations, and jury trial demand, including all causes of action against Iran, as set forth in the following complaint [**check only one complaint**]:

- ☐ Federal Insurance and Ashton Plaintiffs' Amended Consolidated Complaint Against Defendant, the Islamic Republic of Iran, MDL ECF No. 3237
- ☒ Amended Complaint, Burnett v. Islamic Republic of Iran, No. 15-CV-9903 (GBD)(SN) (S.D.N.Y. Feb. 8, 2016), ECF No. 53

IDENTIFICATION OF NEW PLAINTIFFS

Each New Plaintiff is or was a survivor of a person who died due to the terrorist attacks of September 11, 2001. For each New Plaintiff, the following chart lists the New Plaintiff's name, the New Plaintiff's residency and nationality, the name of the New Plaintiff's deceased family member, the New Plaintiff's relationship to the decedent, and the paragraph(s) of the underlying Complaint discussing the decedent and/or the decedent's estate.

	New Plaintiff's Name (alphabetical by last name)	New Plaintiff's State of Residency at Filing	New Plaintiff's Citizenship/ Nationality on 9/11/2001	9/11 Decedent's Name	New Plaintiff's Relationship to 9/11 Decedent	Paragraphs of Complaint Discussing 9/11 Decedent
1.	Anne Lynn Hayashi, individually, as surviving spouse of Stuart (Soo-Jin) Lee	NY	United States	Stuart (Soo-Jin) Lee	Spouse	ECF No. 1 ¶ 5, App. ¶ 48
2.	Dennis Ketcham, individually, as surviving parent of Douglas D. Ketcham	FL	United States	Douglas D. Ketcham	Parent	ECF No. 1 ¶ 5, App. ¶ 73
3.	Dennis Ketcham as Personal Representative of the Estate of Raenell Ketcham, deceased, the late parent of Douglas D. Ketcham	FL	United States	Douglas D. Ketcham	Parent (Deceased)	ECF No. 1 ¶ 5, App. ¶ 73
4.	Shweta Khandelwal, individually, as surviving spouse of Rajesh Khandelwal	NJ	India	Rajesh Khandelwal	Spouse	ECF No. 1 ¶ 5, App. ¶ 8
5.	Susan M. King as Personal Representative of the Estate of Stewart King, deceased, the late parent of Amy King	NY	United States	Amy King	Parent (Deceased)	ECF No. 1 ¶ 5, App. ¶ 1
6.	James McKenley, individually, as surviving sibling of Jacqueline Young	SC	United States	Jacqueline Young	Sibling	ECF No. 1 ¶ 5, App. ¶ 12

7.	Caitlin Duffy Meloy, individually, as surviving sibling of Christopher Duffy	MA	United States	Christopher Duffy	Sibling	ECF No. 1 ¶ 5, App. ¶ 71
8.	Amy Mulderry, individually, as surviving sibling of Stephen Mulderry	NY	United States	Stephen Mulderry	Sibling	ECF No. 1 ¶ 5, App. ¶ 98
9.	Andrew Mulderry, individually, as surviving sibling of Stephen Mulderry	NY	United States	Stephen Mulderry	Sibling	ECF No. 1 ¶ 5, App. ¶ 98
10.	Anne M. Mulderry, individually, as surviving parent of Stephen Mulderry	NY	United States	Stephen Mulderry	Parent	ECF No. 1 ¶ 5, App. ¶ 98
11.	Anne C. Mulderry, individually, as surviving sibling of Stephen Mulderry	NY	United States	Stephen Mulderry	Sibling	ECF No. 1 ¶ 5, App. ¶ 98
12.	Daniel Mulderry, individually, as surviving sibling of Stephen Mulderry	CA	United States	Stephen Mulderry	Sibling	ECF No. 1 ¶ 5, App. ¶ 98
13.	Darra Mulderry, individually, as surviving sibling of Stephen Mulderry	RI	United States	Stephen Mulderry	Sibling	ECF No. 1 ¶ 5, App. ¶ 98
14.	Peter Mulderry, individually, as surviving sibling of Stephen Mulderry	NY	United States	Stephen Mulderry	Sibling	ECF No. 1 ¶ 5, App. ¶ 98
15.	Amy Mulderry as Personal Representative of the Estate of William Mulderry, deceased, the late parent of Stephen Mulderry	NY	United States	Stephen Mulderry	Parent (Deceased)	ECF No. 1 ¶ 5, App. ¶ 98
16.	William J. Mulderry, individually, as surviving sibling of Stephen Mulderry	NJ	United States	Stephen Mulderry	Sibling	ECF No. 1 ¶ 5, App. ¶ 98
17.	Kara Mylod, individually, as surviving sibling of Christopher Duffy	GA	United States	Christopher Duffy	Sibling	ECF No. 1 ¶ 5, App. ¶ 71

18.	Lorraine Nedell, individually, as surviving spouse of Laurence Nedell	NY	United States	Laurence Nedell	Spouse	ECF No. 1 ¶ 5, App. ¶ 9
19.	Stefanie Oliva, individually, as surviving spouse of Alex F. Ciccone	NY	United States	Alex F. Ciccone	Spouse	ECF No. 1 ¶ 5, App. ¶ 70
20.	Valada B. Penny, individually, as surviving spouse of Richard Penny	GA	United States	Richard Penny	Spouse	ECF No. 1 ¶ 5, App. ¶ 84
21.	June Pietruszkiewicz, individually, as surviving spouse of James Suozzo	SC	United States	James Suozzo	Spouse	ECF No. 1 ¶ 5, App. ¶ 100
22.	Gayle Regan, individually, as surviving spouse of Thomas Regan	NJ	United States	Thomas Regan	Spouse	ECF No. 1 ¶ 5, App. ¶ 40
23.	Elizabeth Rick, individually, as surviving spouse of Scott Bart	NY	United States	Scott Bart	Spouse	ECF No. 1 ¶ 5, App. ¶ 92
24.	Isabel Roach, individually, as surviving spouse of Stephen Roach	SC	United States	Stephen Roach	Spouse	ECF No. 1 ¶ 5, App. ¶ 88
25.	Lynda T. Scarcella, individually, as surviving spouse of Paul Fiori	CT	United States	Paul Fiori	Spouse	ECF No. 1 ¶ 5, App. ¶ 53

Dated: July 8, 2022

Respectfully submitted,

/s/ Jerry S. Goldman

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